

**BERANBAUM MENKEN LLP**

80 PINE STREET, 33RD FLOOR

NEW YORK, NEW YORK 10005

TELEPHONE: (212) 509-1616

FACSIMILE: (212) 509-8088

WWW.NYEMPLOYEEELAW.COM

JOHN A. BERANBAUM <sup>Δ</sup>  
BRUCE E. MENKEN  
JASON J. ROZGER <sup>Δ</sup>  
GRACE CRETCHER  
SCOTT SIMPSON

<sup>Δ</sup> ALSO ADMITTED NJ

**BY ECF ONLY**

January 20, 2016

Honorable Kevin Nathaniel Fox  
US Magistrate Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

RE: A.R. et al., v. City of New York, et al., 15 Civ. 9242 (RMB)(KNF)

Dear Magistrate Judge Fox:

I am co-counsel to the Plaintiffs and putative class in the above matter and write pursuant to District Judge Richard Berman's instructions and with defense counsels' consent to provide the court with the following agreed upon discovery dates:

- (i) Joinder of additional parties by April 1, 2016;
- (ii) Amend the pleadings by April 1, 2016; and,
- (iii) All discovery to be expeditiously completed by June 13, 2016.

In addition, the parties do not consent to proceed before a Magistrate Judge and there have been no settlement discussions to date.

Respectfully submitted,



Bruce E. Menken

BEM:os  
cc: All counsel of record  
(By ECF Only)